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Federal Communications Commission	
Docket No.	<u>92-207</u> Exhibit two <u>8</u>
Presented by <u>MASS MEDIA</u>	
Disposition	Identified <u>2/17</u>
	Received <u>2/17</u>
	Rejected _____
Reporter	<u>BARBARA LORR</u>
Date	<u>2/17/93</u>

Arent Fox Kintner Plotkin &

Susan A. Marshall  
202/857-6110

October 15, 1991

Glenn A. Wolfe, Chief  
EEO Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 7218  
Washington, D.C. 20554

Re: Stations WHOS(AM) and WDRM(FM), Decatur, Alabama

Dear Mr. Wolfe:

Submitted herewith, on behalf of Dixie Broadcasting, Inc., Debtor-in-Possession, licensee of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama, is a Statement signed by J. Mack Bramlett, an officer and director of the licensee and General Manager of the stations.

This Statement is being submitted in response to an informal request made by Hope Cooper of your office for further information concerning the employment practices at the stations.

Please call me if you have any questions concerning the enclosed.

Sincerely,

*Susan A. Marshall*

Susan A. Marshall  
Counsel for Dixie Broadcasting, Inc.,  
Debtor-in-Possession

1050 Connecticut Avenue, NW  
Washington, DC 20036-5339

Telephone: 202/857-6000  
Cable: ARFOX  
Telex: WU 892672  
ITT 440266  
Facsimile: 202/857-6395

SAM/pat

Enclosure

Courtesy Copy: Hope Cooper

cc (w/enc.): David Honig, Esquire

bcc (w/enc.): J. Mack Bramlett  
(for WHOS/WDRM local public records files)

bcc (wo/enc.): Daniel Van Horn

7475 Wisconsin Avenue  
Bethesda, Maryland 20814-3413

8000 Crescent Drive  
Vienna, Virginia 22182-2733

STATEMENT

I, J. Mack Bramlett, hereby state under penalty of perjury as follows:

1. I am an officer and director of the licensee and General Manager of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama. Stations WHOS and WDRM are licensed to Dixie Broadcasting, Inc., Debtor-in-Possession.

2. I have worked at Stations WHOS and WDRM since

Cooper is questioning why so few new hires (20) were reported for that seven-year period when the stations had as many as eight, almost one-half that number, job openings during the 15-month period from February 1989 through mid-April 1991, alone.

4. In response to this request, the stations' staff has again reviewed the stations' records and determined that there is nothing more to add. All of the information which is available for the 1982 through April 1991 period concerning the stations' EEO efforts has been provided to the Commission in various filings, including the licensee's July 28, 1989 response to the FCC's earlier request for EEO information and the licensee's April 18, 1991 Supplement thereto. The stations' staff has determined that the variation in the number of available vacancies during the years under scrutiny can only be attributed to the turnover rate at radio broadcast stations which often varies from year to year.

5. I have read the foregoing and have determined that, to the best of my knowledge and belief, all of the facts contained herein concerning the employment record of Stations WHOS and WDRM are accurate and complete.

Executed on this 10 day of October, 1991.

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Federal Communications Commission	
Docket No. <u>92-287</u>	Exhibit <u>9</u>
Presented by <u>MASS MEDIA</u>	
Disposition	Identified <u>2/17</u>
	Received <u>2/17</u>
	Rejected _____
Reporter <u>BARBARA LORD</u>	
Date <u>2/17/93</u>	

FCC MAIL SECTION

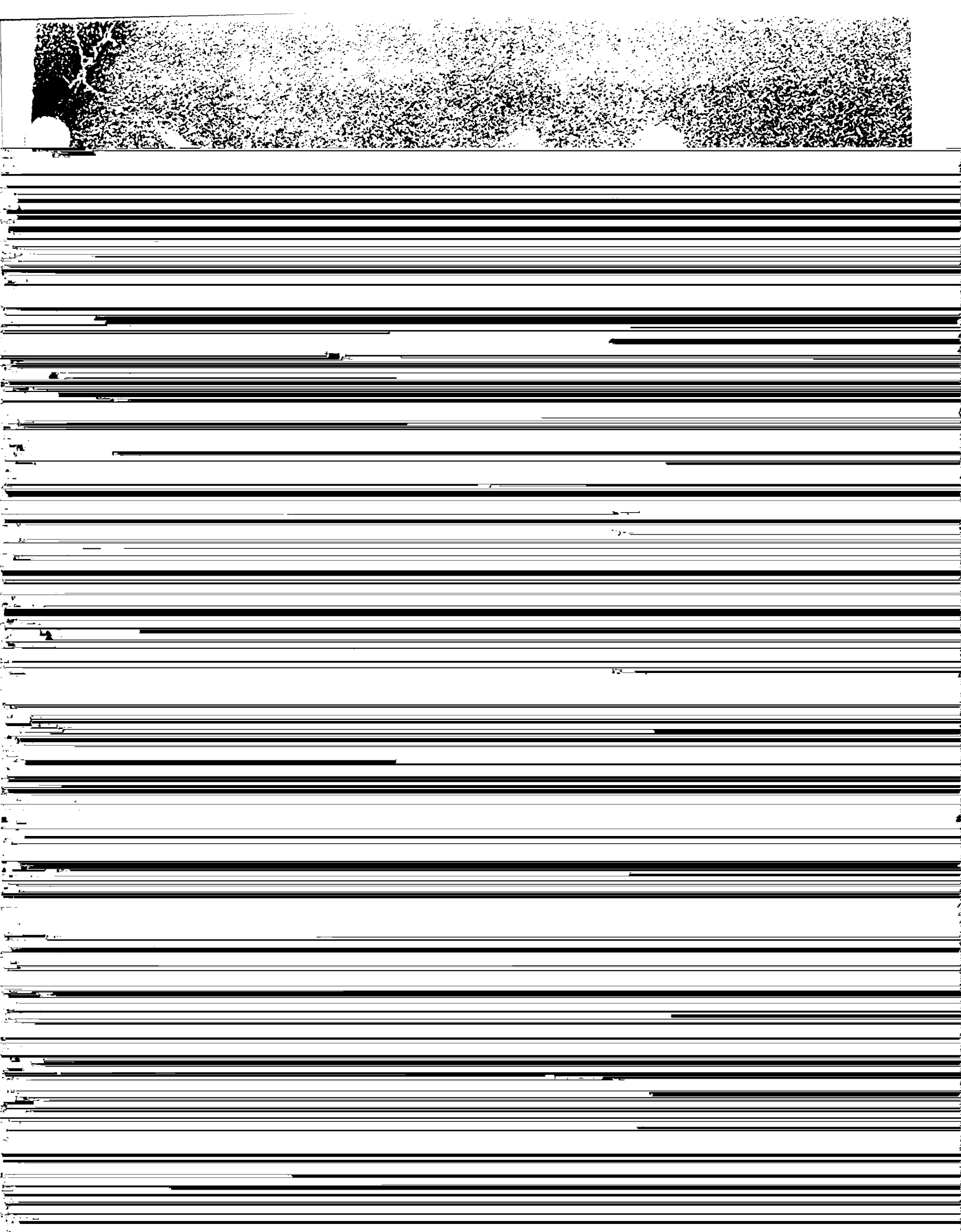
JAN 2 12 05 PM '92

DIST. BY

J. Mack Bramlett  
Vice-President  
Dixie Broadcasting, Inc.  
402 14th St., S.E.  
Decatur, Alabama 35602

Re: Stations WHOS(AM)/WDRM(FM)  
Decatur, Alabama

Dear Mr. Bramlett:





Federal Communications Commission	
Docket No. <u>92-207</u>	Exhibit No. <u>10</u>
Presented by <u>MASS MEDIA</u>	
Disposition	Identified <u>2/17</u>
	Received <u>2/17</u>
	Rejected _____
Reporter <u>BARBARA LORA</u>	
Date <u>2/17/93</u>	

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JAN 13 1992

Susan A. Marshall  
202/857-6110

January 13, 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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JAN 21 1992

Glenn A. Wolfe, Chief  
EEO Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 7218  
Washington, D.C. 20554

Re: Stations WHOS(AM) and WDRM(FM), Decatur, Alabama

Dear Mr. Wolfe:

Submitted herewith, on behalf of Dixie Broadcasting, Inc., Debtor-in-Possession, licensee of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama, is a Supplemental Report relative to the employment practices of the stations.

The enclosed Report is being submitted in response to an informal request on December 18, 1991 of Hope G. Cooper, Esquire, of the FCC's EEO Branch and a subsequent follow-up letter from you to J. Mack Bramlett, Vice President of the licensee. Based on an informal conversation with Ms. Cooper, the deadline for submitting the Report was extended to and including today, January 13, 1992.

Please call me if you have any questions concerning the enclosed materials.

Sincerely,



Susan A. Marshall  
Counsel for Dixie Broadcasting, Inc.,  
Debtor-in-Possession

1050 Connecticut Avenue, NW  
Washington, DC 20036-5339

Telephone: 202/857-6000  
Cable: ARFOX  
Telex: WU 892672  
ITT 440266  
Facsimile: 202/857-6395

SAM/pat

Courtesy Copy: Hope G. Cooper, Esquire

cc (w/enc.): David E. Honig, Esquire

7475 Wisconsin Avenue  
Bethesda, Maryland 20814-3413

Towers Crescent Drive  
Arlington, Virginia 22182-2733

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JAN 13 1992










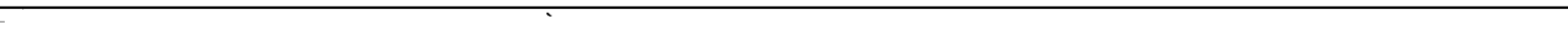

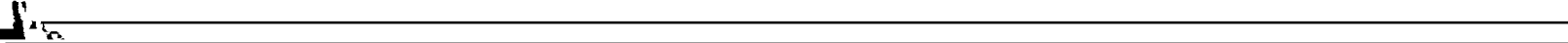





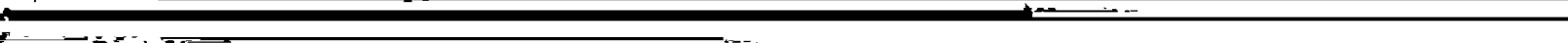






SUPPLEMENTAL REPORT<sup>1/</sup>

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

This is a Supplemental Report relative to the employment practices at Stations WHOS(AM) and WDRM(FM), Decatur, Alabama. It is being prepared in response to an informal request on December 18, 1991 of Hope G. Cooper, of the FCC's EEO Branch, and a subsequent follow-up letter from Glenn A. Wolfe, Chief of the

1989 period must have been greater than the approximately 20 specified by the licensee. The Commission is now requesting an explanation for this noted "discrepancy."

In response to the instant request, the licensee has again reviewed the stations' records. As a result of its review of the existing records, the licensee has determined that the information previously provided to the Commission was the best



exists to support the information provided about the additional new hires.

Despite the stations' lack of adequate records, it is clear from the information for which documentation does exist that during the period 1982 through February 1989, the licensee did engage in recruitment efforts to employ African-Americans for job openings. As previously reported in the July 28, 1989 and April 18, 1991 Reports, advertisements were placed in a number of newspapers and the stations recruited employees from a number of schools, including the National Career College, the University of Alabama, and Calhoun Community College, with substantial minority enrollment. The stations also participated in an internship program with the University of Alabama, which, during the summers of 1987 and 1988, resulted in the training of several students for promotion and on-air positions. As a result of their contact with these recruitment sources from 1982 through February 1989, the stations hired at least seven minority employees which is a substantial number (constituting 8.4% of the now-determined 83

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<sup>3/</sup>(...continued)

to the staff, apparently had been stored there during a move of the stations' studios. The staff was unaware of the existence of these payroll lists and believed that they had been lost or destroyed during the move. Consequently, the staff had relied on the few records which remain on site at the stations to support their prior estimate that there were "approximately 20" new hires. With the discovery of the warehoused lists, the staff can now more accurately determine the number of new hires. However, any information provided herein about the stations' efforts to recruit the additional new hires is based on the collective memory of the staff.

new hires), in view of the fact that there are only 7.4% African-Americans in the local labor force.<sup>4/</sup>

More recently, the licensee has maintained its close ties with local African-American community leaders, as evidenced by the letters from the President of the Decatur/Morgan County Chapter of the NAACP and the co-owner of local African-American radio Station WEUP which are attached to the licensee's April 18, 1991 Supplemental Report. WHOS and WDRM have also continued to utilize other local minority recruitment sources. Therefore, despite the small number of African-American workers available in the local labor force, the stations' post-February 1989 minority hiring rate continues to reflect the licensee's contacts with local African-American community leaders and other recruitment sources.

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<sup>4/</sup> As previously reported, Stations WHOS and WDRM are licensed to Decatur, Alabama, which is located in Morgan County and is not part of any MSA. According to the 1980 Census Data Summary Report--State and County Total Percentage for Total Employed Civilian Labor Force--Morgan County, Alabama, there are 7.4% African-Americans in the local labor force. Other racial minorities are not included in this figure since they are represented in statistically insignificant numbers--0.5% Hispanics, 0.2% Asians and 0.1% American Indians.

**EXHIBIT A**

NEW HIRES AT STATIONS WHOS/WDRM  
DURING 1982 - FEBRUARY 1989

During the year of 1982, WHOS/WDRM hired 4 white males, 2 white females and 3 African-American males. All of these positions were in the upper 4 categories.

In 1983, WHOS/WDRM hired 9 white males, 3 white females, 1 African-American male and 1 African-American female for full time positions and 2 African-American males for part time positions.<sup>1/</sup>

In 1984, WHOS/WDRM hired 5 white males, 3 white females, 1 white male part time.

In 1985, WHOS/WDRM hired 4 white males, 6 white females for



**EXHIBIT B**

**STATEMENT**

I, J. Mack Bramlett, hereby state under penalty of perjury as follows:

1. I am an officer and director of the licensee and General Manager of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama. Stations WHOS and WDRM are currently licensed to Dixie Broadcasting, Inc., Debtor-in-Possession.
2. I have worked at Stations WHOS and WDRM since 1962. I had been responsible for the Station's Equal Employment Opportunity Program since 1976 when the current licensee acquired WHOS and WDRM. I have held the title of officer and director of the licensee since 1976, as well.
3. I have read the foregoing Supplemental Report relative to the employment practices of Stations WHOS and WDRM and have determined that, to the best of my knowledge and belief, all of the facts contained therein concerning the employment record and affirmative action efforts of WHOS and WDRM were supplied by me and my staff and are accurate and complete.

Executed on this 13 day of January, 1992.

  
J. Mack Bramlett

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Federal Communications Commission	
Docket No	92-207
Exhibit No	11
Presented by	MASS MEDIA
Disposition	Identified 2/17
	Received 2/17
	Rejected
Reporter	BARBARA LOKO
Date	2/17/93

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARYSusan A. Marshall  
202/857-6110

February 7, 1992

CONTROL SECTION

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Glenn A. Wolfe, Chief  
EEC Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 7218  
Washington, D.C. 20554

Re: Stations WHOS(AM) and WDRM(FM), Decatur, Alabama

Dear Mr. Wolfe:

Submitted herewith, on behalf of Dixie Broadcasting, Inc., Debtor-in-Possession, licensee of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama, is further information relative to the employment practices of the stations.

The enclosed materials are being submitted in response to an informal request made on January 24, 1992, by Hope Cooper, Esquire, of your staff, and a subsequent follow-up letter from you to J. Mack Bramlett, Vice President of the licensee. Based on an informal conversation with Ms. Cooper, it is my understanding that the deadline for submitting the enclosed materials was extended to and including today, February 7, 1992.

1050 Connecticut Avenue, NW  
Washington, DC 20036-5339

Please call me if you have any questions concerning the enclosed.

Telephone: 202/857-6000  
Cable: ARFOX  
Telex: WU 892672  
ITT 440266  
Facsimile: 202/857-6395

Sincerely,



Susan A. Marshall  
Counsel for Dixie Broadcasting, Inc.  
Debtor-in-Possession

8000 Towers Crescent Drive  
Vienna, Virginia 22182-2733

SAM/pat

7475 Wisconsin Avenue  
Bethesda, Maryland 20814-3413

Courtesy Copy (w/enc): Hope Cooper, Esquire

45 Rockefeller Plaza  
New York, New York 10111

cc (w/enc.): David Honig, Esquire

ent/Fox Europe  
Budapest, Hungary

RECEIVED

FEB - 7 1992

SUPPLEMENTARY MATERIALS<sup>1</sup>

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Attached hereto are materials relative to the employment practices of Station WHOS(AM) and WDRM(FM), Decatur, Alabama. These materials are being submitted in response to an informal request, made by Hope G. Cooper, Esquire, of the FCC's EEO Branch, and a subsequent follow-up letter from Glenn A. Wolfe, Chief of the EEO Branch, to J. Mack Bramlett, Vice President of the licensee. Pursuant to that letter, the licensee is submitting the following:

1. A list (attached as Exhibit 1)<sup>2</sup> of the 83 employee new hires during the 1982 through February 1989 period. The list includes the names of the hirees, their

2. A list (attached as Exhibit 2) of the 57 people who were hired during the period 1982 through February 1989 but who were not considered "employees" of the stations. Those 57 individuals are in addition to the 83 hires listed in Exhibit 1. Exhibit 2 also provides the names of the individuals, the dates of their hire, the titles of their positions, the FCC Form 395-B classification of their positions, the full- or part-time status of their positions, the race and gender of the individuals and their dates of termination.

These 57 individuals were not considered by the licensee to be employees of the stations because either (a) they were hired as independent contractors on a purely temporary or "fill-in" basis and were not intended to work on a permanent basis, or (b) they were hired on a permanent basis, but were asked to leave their employment after a 60 to 90-day probationary period because they were found not to be qualified for the positions for which they were hired.

It should also be noted that the four individuals (referred to in footnote 5 of the stations' July 28, 1989 Report to the Commission), who were hired during the November 1, 1987 through November 2, 1988 reporting year and who should not have been counted among the "employee" new hires in the stations' renewal (Form 396), are among those listed in Exhibit 2. Specifically, those four individuals, who were incorrectly counted as new employee hires in the renewal, were hired on a temporary "fill-in" basis.

3. Payroll records (attached as Exhibit 3) which document information provided in the Exhibit 1 and Exhibit 2 lists.

**EXHIBIT 1**

EXPLANATION OF 83 HIRES 1982-FEB 1989  
BY DATE

CLASSIFICATION AND STATUS

RACE

GENDER TERMINATION DATE



EXPLANATION OF 83 HIRES 1982-FEB 1989  
BY DATE

DATE	NAME	JOB TITLE	395-B CLASSIFICATION	JOB STATUS	RACE	GENDER	TERMINATION DATE
1/08/15	Mazie Smith	Sales	Sales Worker	Full Time	White	Female	Present
	Timothy Branlett	Announcer	Professional	Full Time	White	Male	89/08/14
1/09/15	Mack Goodwin	Sales Manager	Manager	Full Time	White	Male	Present